

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Melvin Jones Jr. (and other indigent disabled ADULT
Flint residents whom are similarly situated)

*(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)*

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: Yes No
(check one)

v.

VEOLIA NORTH

*(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names.)*

Complaint for a Civil Case

(see related case notice)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Melvin Jones Jr.
Street Address	1935 Hosler St.
City and County	Flint Genesee County
State and Zip Code	Michigan, 48503
Telephone Number	810-962-6225
E-mail Address	meljonesjr@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	VEOLIA NORTH/ Veolia
Job or Title (if known)	
Street Address	Chemin de la Digue
City and County	Maisons-Laffitte France, EU
State and Zip Code	BP 76 78603
Telephone Number	01 34 93 31 31
E-mail Address (if known)	jmcampbell@campbell-triallawyers.com

Defendant No. 2

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

Defendant No. 3

Name _____

Job or Title _____
(if known) _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____
(if known) _____

Defendant No. 4

Name _____

Job or Title _____
(if known) _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____
(if known) _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

GENERAL FEDERAL JURISDICTION AS CURRENTLY PERTAINS TO THE
FLINT WATER CRISIS LAWSUITS # 16-cv-10444 JEL MKM

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) MELVIN JONES JR (and class members)
is a citizen of the State of (name) MICHIGAN .

b. If the plaintiff is a corporation

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (*name*) VEOLIA NORTH, is a citizen of the State of (*name*) . Or is a citizen of (*foreign nation*) FRANCE.

b. If the defendant is a corporation

The defendant, (*name*) VEOLIA NORTH, is incorporated under the laws of the State of (*name*), and has its principal place of business in the State of (*name*)
_____. *Or* is incorporated under the laws of (*foreign nation*) FRANCE, and has its principal place of business in (*name*) FRANCE.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

As the Honorable Court deems just and appropriate.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Veolia North is a world class company and is and was (e.g. in or about) 2015 of the ability and professional ability to meaningfully prevent the contuned harm suffered by the Disabled Residents of the City of Flint as to it's sloppy contract and bid procedures which were undertaken by Veolia with the City of Flint. Here, Veolia undertook sloppy and substandard bid and contractual procedures in that the PROPER "players" as to such WERE NOT appropriately involved in said process.

For example, VEOLIA was sloppy in NOT including in NOT properly including the appropriate Michigan State "player[s]" in said bid and proposal process [AND] said contractual process with the City of Flint ---- and thereby VEOLIA's "part as a player in the Flint Water Crisis [and] caussation as to my continued harm [and others similarly situattted as me] unfortunately accelearted the continued adverse harm and/ or substantially [unduely] contributed to such.

Further, VEOLIA was sloppy in not including (as a review and complaince "chek point" [for example]) with the appropriate United States Governmental "player[s]" as the [sloppy] bid, proposal and contractual process with the City of Flintwhich also CONTINUES to add to the continuied harm suffered by me (and others similarly situated in the City of Flint) due to such.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

HARM AS TO MY ONGOING FEAR OF THE USE AND SAFETY OF THE WATER AT MY HOME;

CONTINUED HARM DUE TO VEOLIA SLOPPY BID AND CONTRACTUAL PROCEEDURES WITH THE CITY OF FLINT,

CONTINUED HARM AS TO VEOLIA FAILURE TO PROPERLY CONSIDER THE DISABLED FLINT RESIDENTS SUCH AS MYSELF AND THOSE SIMILARILY SITUATED WHICH CONTINUES TO RESULT (and/ or) HAS FURTHERED THE SILENT EMOTIONA: TOLL UPON THE DISABLED IN THE CITY OF FLINT,

CONTINUED HARM AS TO VEOLIA's FAILURE TO RPOPERLY CONSIDER THE DISABLED POPULATION OF THE CITY OF FLINT's IMPOVERISHED ECONOMIC STAT STATUS

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: April 27th, 20 21.

Signature of Plaintiff

Printed Name of Plaintiff

MELVIN JONES JR.

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Additional Information:

PLEASE NOTE:

1. Plaintiff Melvin Jones Jr. is a disabled person per MCL 257.19a --- and is markedly mobility impaired, and due to his serious medical disability... Jones' Michigan State Drivers License is medically suspended,
- 2.) This Civil Complaint seeks CLASS CERTIFICATION for those similarly situated as Disabled Plaintiff Melvin Jones Jr.,

REQUEST FOR APPOINTMENT OF COUNSEL:

Due to the complexity of intended Class Action Status of the instant Law Suit.... Plaintiff Melvin Jones Jr. respectfully requests APPOINTMENT OF AN ATTORNEY by the Court.

CASE TRANSFER APPROPRIATE:

This CASE should be tranfered to Hon. Judge Levy

RELATED CASE NOTICE:

- 2.) The instant CIVL COMPLAINT is made with a simutaneous request for appointment of attorney by the Court.... because this case is RELATED to current litigation in the Federal District Court in Ann Arbor --- the Flint Water Crisis Case pending against VEOLIA ...case # 16-cv-10444 JEL MKM.

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

Yes
 No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

Yes
 No

If yes, give the following information:

Court: Federal District Court - ANN ARBOR

Case No.: 5:16-cv-10444 JEL MKM

Judge: Hon. Judge Judith Levy

Notes :
